

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Package Service (FCPS)
Service Standard Changes, 2021

Docket No. N2021-2

PUBLIC REPRESENTATIVE'S SECOND SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS STEPHEN B. HAGENSTEIN
(PR/USPS-T-1)

(July 16, 2021)

Pursuant to 39 C.F.R. §§ 3020.117 and 3020.118, the Public Representative hereby submits the following interrogatories and requests for production of documents. Please refer to the replacement testimony of Witness Stephen B. Hagenstein.¹

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or questions of clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,
/s/ Mallory L. Smith
Public Representative for
Docket No. N2021-2

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¹ See Notice of Filing Replacement Direct Testimony of Stephen B. Hagenstein on Behalf of the United States Postal Service (USPS-T-1), June 21, 2021.

1. Please refer to USPS-T-1 at 4, lines 14-22 and at 5, lines 1-2. Witness Hagenstein states that “the proposed service standard change supports the transition of the Network Distribution Centers (NDCs) to Regional Distribution Centers (RDCs), dedicated to package processing as outlined in the 10-year Plan, Delivering for America.”² Witness Hagenstein then states that after the “coast-to-coast First-Class surface network is established, the current NDC-to-NDC network will be consolidated into the preferential surface network. This consolidation is estimated to reduce between 14 and 28 percent of the current inter-NDC trips and between 6 and 8 percent of the intra-NDC trips.”
 - a. Please explain the time line for the transition from NDCs to RDCs and the annual estimated cost savings.
 - b. Please explain how this time line fits into your projected 14 to 28 percent reduction in Inter-NDC network trips and a 6 to 8 percent reduction in Intra-NDC network trips.
2. Please see Attachment, filed under seal

² See United States Postal Service, Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence, March 23, 2021 (Postal Service’s Strategic Plan), at 3, available at, https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS_Delivering-For-America.pdf.